

Sealed
Public and unofficial staff access
to this instrument are
prohibited by court order

UNITED STATES DISTRICT COURT

for the

Southern District of Texas



United States Courts
Southern District of Texas
FILED

May 14, 2025

Nathan Ochsner, Clerk of Court

United States of America

v.

MARQUIEZ RHEM

Case No.

4:25-mj-297

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 4/02/2025 and 4/09/2025 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

Title 21, U.S.C. 841(a)(1), 841(b)(1)
(A)(ii), and 846

Offense Description

Attempt to Possess with Intent to Distribute a Controlled Substance.

Title 18, U.S.C. 924(c)(1)(A)(i) and
2

Possession of a Firearm in Furtherance of a Drug Trafficking Crime.

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

Complainant's signature

Joseph Stevens, FBI Special Agent

Printed name and title

Sworn to before me and signed by telephone.

Date: May 14, 2025City and state: Houston, Texas

Judge's signature

Richard W. Bennett, U.S. Magistrate Judge

Printed name and title

Sealed

Public and unofficial staff access
to this instrument are
prohibited by court order

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

4:25-mj-297

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Joseph Stevens, being duly sworn, do hereby depose and state:

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been since January 2020. I have been assigned investigative responsibility in the areas of violent crimes in the Houston Division of the FBI. Prior to that, I investigated financial crimes and public corruption in the Columbia Division of the FBI. Through the FBI, I have received extensive training related to the investigation of federal crimes to include violent crimes. I have also received formal education and training in the concepts of probable cause, reasonableness for searches and seizures, and participated in numerous aspects of firearm and drug investigations.

2. I am making this affidavit in support of a criminal complaint to be presented to the United States District Court for the Southern District of Texas in the matter of United States v. MARQUIEZ JAMINE RHEM.

3. The facts in support of this affidavit and contained in the following paragraphs are the result of a joint investigation between the FBI, Department of Public Safety ("DPS"), and Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF") into investigating the Money Blass Gang ("MBG"). MBG has been identified in carrying out various acts of violence, including home invasions, heisting cars, armed robberies, and drug and weapons trafficking, within the Houston area. Since February 2025, the investigative team has conducted drug and weapons-based operations, a drug escort operation, and a staged sting operation involving MBG.

4. MARQUIEZ JAMINE RHEM has been identified through these operations to be a leader of MGB. This affidavit is being submitted in support of a criminal complaint charging

RHEM with drug trafficking and attempt and conspiracy, in violation of Title 21 United States Code, Section 841 and 846 and possession of a firearm in furtherance of a drug trafficking crime in violation of Title 18 United States Code, Section 924.

5. This complaint charges that on or about April 2, 2025, in the Southern District of Texas, MARQUIEZ JAMINE RHEM, did knowingly and intentionally attempt to possess with the intent to distribute at least five kilograms of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers and salt of isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii).

6. This complaint charges that on or about April 2, 2025, in the Southern District of Texas, MARQUIEZ JAMINE RHEM, did knowingly possess at least one firearm in furtherance of a drug trafficking crime for which each may be prosecuted in a court of the United States, namely knowingly and intentionally conspiring to and attempting to possess with intent to distribute a controlled substance, in violation of 21 U.S.C. Sections 846(a)(1) and 846, all in violation of 18 United States Code Sections 924(c)(1)(A)(i) and 2.

7. This complaint charges that on or about April 9, 2025, in the Southern District of Texas, MARQUIEZ JAMINE RHEM, did knowingly and intentionally attempt to possess with the intent to distribute at least five kilograms of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers and salt of isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii).

8. This complaint charges that on or about April 9, 2025, in the Southern District of Texas, MARQUIEZ JAMINE RHEM, did knowingly possess at least one firearm in furtherance

of a drug trafficking crime for which each may be prosecuted in a court of the United States, namely knowingly and intentionally conspiring to and attempting to possess with intent to distribute a controlled substance, in violation of 21 U.S.C. Sections 846(a)(1) and 846, all in violation of 18 United States Code Sections 924(c)(1)(A)(i) and 2.

9. Due to the limited purpose of this affidavit, your Affiant has not included each and every fact known concerning this investigation, although your Affiant has not omitted any material fact that undermines the statements and conclusions herein. Your Affiant has set forth only the facts your Affiant believes are necessary to establish probable cause to show that RHEM violated Title 21 United States Code, Section 841 and 846 and Title 18 United States Code, Section 924.

PROBABLE CAUSE

10. On or about February 25, 2025, the FBI, DPS, and ATF began investigating MARQUIEZ JAMINE RHEM (RHEM) and other MBG members. RHEM posts on social media glamorizing home invasions and other violent acts, as well as made a YouTube movie, “On God Nem,” illustrating home invasions in the Houston area that RHEM and other MBG members have committed.

11. Investigators have utilized an FBI Confidential Human Source (“CHS”) to conduct numerous drug and firearm purchases from RHEM at the direction of FBI Agents with the use of government funds. In order to help identify other members of MBG, FBI Agents directed the CHS to inform RHEM of a drug escort opportunity that needed security due to rival gangs stealing the drugs.

12. On or about April 2, 2025, FBI conducted surveillance on RHEM and other MBG members. At approximately 3:55 pm, a silver Toyota RAV4 bearing Texas license plate WJV9736 arrived at a Best Western Hotel located in Houston, Texas. RHEM and three black males were

observed exiting the vehicle and meeting with the CHS in the Best Western Hotel's parking lot. A few minutes later, a white Ford F-150 bearing Texas license plate 7605N82 arrived at the Best Western Hotel and parked next to the CHS's vehicle. Two black males exited the Ford F-150 and met with the rest of the group.

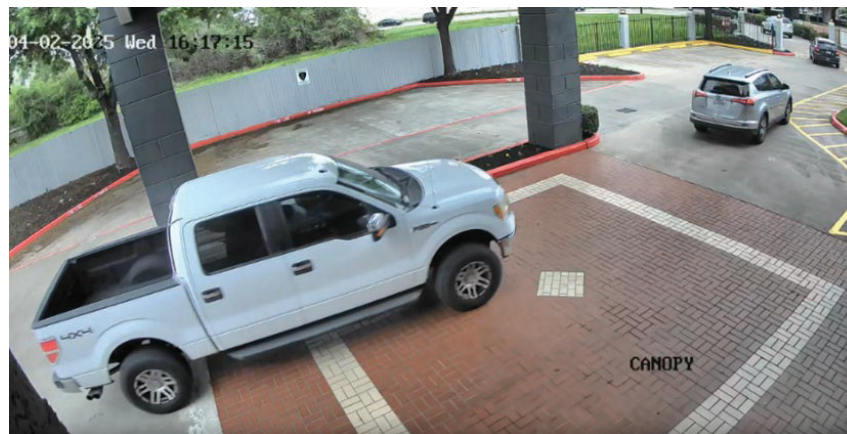
13. At approximately 4:00 pm, RHEM and five black males entered the Best Western Hotel with the CHS and entered room #325. FBI had hotel room #325 consensually monitored for audio and video with the CHS. While inside the room, the CHS explained to RHEM and the five black males that they were to provide a vehicle security escort for a "drug vehicle" which contained a load of 40 kilograms of cocaine through a black Colombian territory, a route that was at risk for the drug load to be stolen. RHEM stated if a vehicle were to pull up during the security escort, RHEM would "swiss cheese that bitch." Based on my training and experience, when RHEM stated he would "swiss cheese" the vehicle, he intended to put bullet holes into the vehicle if someone tried to rob the "drug vehicle."

14. The CHS asked everyone in the room if they were carrying firearms. RHEM and two black males had weapons on their person, three other black males stated their weapons were inside the vehicle parked outside the hotel.

15. The CHS paid a total of \$2,500 to the individuals inside the hotel room, \$500 per person for the drug escort. Photographed below from left to right is Lavar Williams (in blue shorts, white shirt), Carlton Deray Scott II (middle), and RHEM (right).



16. At approximately 4:14 pm, the CHS, RHEM, and the other black males departed the Best Western Hotel room and exited the hotel. The CHS pointed out which vehicle was the “drug vehicle” that they would be escorting. The “drug vehicle” was being driven by a second FBI CHS. Photographed below is the Toyota RAV4 and the Ford F-150 departing the hotel parking lot to begin the drug escort.



17. FBI, ATF, and DPS agents had surveillance of the entire escort route and observed both target escort vehicles, the Toyota RAV4 and the Ford F-150, stay in tandem with the “drug vehicle” the entire way. Once the “drug vehicle” reached its destination, both target escort vehicles pulled into a 7-Eleven gas station at 4011 Highway 6 North, Houston, Texas 77084 along with the CHS, while the “drug vehicle” continued to drive past. While at the 7-Eleven, RHEM asked the

CHS about the possibility of robbing the individual that was transporting the drugs and stated that 40 bricks would change his life.

18. On or about April 7, 2025, under the direction of FBI Agents, the CHS told RHEM and other MBG members there would be a Mexican cartel stash-house containing 96 kilograms of cocaine that RHEM and MBG members could rob on April 9, 2025. RHEM and MBG members stated to CHS they would be ready on April 9, 2025, to rob the believed cartel stash-house.

19. On or about April 9, 2025, FBI conducted a sting operation on RHEM and other MBG members. This operation utilized an abandoned golf course pump house located in Houston, Texas that was staged as a cartel's stash-house, which was being audio and video monitored by the FBI.

20. At approximately 2:12 pm, two silver Toyota RAV4s arrived at a Residence Inn Hotel parking lot in Houston, Texas. RHEM and four black males exited the two silver Toyota RAV4s and met with the CHS in the Residence Inn Hotel parking lot.

21. At approximately 2:13 pm, the CHS, RHEM and the four black males entered Residence Inn Hotel room #226. FBI had hotel room #226 consensually monitored for audio and video with the CHS. While inside the room, the CHS told RHEM and the four black males to follow the CHS to the location of the cartel stash-house. The CHS would open the gate for RHEM and the other MBG members to enter the property and rob the cartel stash-house of the 96 kilograms of cocaine. Photographed below is RHEM (in the center) and other MBG members inside the Residence Inn Hotel room #226.



22. At approximately 2:15pm, the CHS, RHEM and the other MBG members departed the Residence Inn Hotel and drove to the abandoned golf course. FBI maintained surveillance on the CHS and both target vehicles, the silver Toyota RAV4s, during the operation. Once the CHS and both target vehicles arrived at the abandoned golf course, the CHS got out of their vehicle and opened the gate to let the target vehicles onto the property. Once both target vehicles drove onto the property, the CHS closed the gate and stayed outside the property.

23. Once inside the gated property, video and audio monitoring observed RHEM and four black males approach the abandoned pump house brandishing firearms. At approximately 2:31 pm, RHEM entered the building brandishing a firearm with an attached drum magazine, also known as a high-capacity magazine, which enhances the firearm by extending the amount of ammunition carried without having to reload. The other MBG members followed RHEM into the property while also brandishing firearms with the anticipation of robbing cartel members of 96 kilograms of cocaine. When RHEM and the other MBG members entered the pump house, they did not find any cartel members present, as they expected to find. RHEM could be heard on video and audio stating they just missed the load. There were several items on scene that were taken by

RHEM and MBG members to include \$99 in government funds and a staged money counter. RHEM is pictured below making entry with a firearm and drug magazine.




24. RHEM and the other MBG members ran back to the Toyota RAV4s with the stolen items and departed the abandoned golf course property. The CHS and the two Toyota RAV4s went separate ways. This concluded the sting operation, which demonstrated RHEM and other MBG members were willing to commit violent acts of crime.

25. Investigators utilized the photographs taken of RHEM during the operations mentioned above to compare with his official government photograph. These photographs appeared to be the same person. Social media records and telephone records were also utilized to identify RHEM.

CONCLUSION


Based on the above information, I believe that probable cause exists that MARQUIEZ JAMINE RHEM committed the following offenses: attempted possession of five kilograms or more of a mixture or substance containing a detectable amount of cocaine with the intent to

distribute, in violation of Title 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii), and 846; and possession of a firearm in furtherance of a drug trafficking crime, in violation of 18 U.S.C. § 924(c)(1)(A)(i).



Special Agent Joseph Stevens
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO me telephonically on this the 14th day of May 2025, and I find probable cause.



The Honorable Richard W. Bennett
United States Magistrate Judge
Southern District of Texas